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November 16, 2012

Mr. Jeff S. Jordan
Supervising Attorney
Complaints Examination & Legal Administration
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

Re: MUR 6621

Dear Mr. Jordan:

Attached is the response to MUR 6621. This is to advise that all sworn declarations with original signatures are available upon request.

Regards,

Chantell Taylor

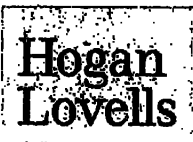
Chantell Taylor

Associate
chantell.taylor@hoganlovells.com
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COMMISSION

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Supervising Attorney
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999 E. Street, NW
Washington, D.C. 20463

Re: MUR 6621

Dear Mr. Jordan:

On behalf of The Broadmoor Hotel, Inc. (the "Broadmoor"), we submit this response to the complaint dated July 31, 2012 (MUR 6621). For the reasons set forth below and in the supporting documents attached, we respectfully request that the Commission find no violation has occurred and that no further action against the Broadmoor is warranted or required.

Overview

The complainant alleges, *inter alia*, that she was improperly solicited to make certain contributions to the American Hotel & Lodging Association ("AHLA") and its separate segregate fund, the American Hotel & Lodging Association Political Action Committee ("HotelPAC"), at an annual fundraising event hosted by the Broadmoor in 2010, 2011 and 2012.

In response, the Broadmoor submits that under no circumstances did it knowingly or willfully violate the Federal Election Campaign Act or any other law. The Broadmoor hosted each of the fundraising events precisely as instructed by AHLA and their counsel, and the Broadmoor reasonably relied on them to comply with federal campaign finance laws. The Broadmoor cannot be held liable for their alleged failure to do so. To the extent the Broadmoor committed any violations of law it did so unintentionally and accidentally.

Background

The Broadmoor has operated in Colorado Springs, Colorado since 1918. It is world-renowned for its Five-Star service, spa, golf and other amenities. The Broadmoor is also cherished by locals who live, work and recreate there on a regular basis. Located on the same property is the Broadmoor Golf Club (the "Golf Club"), a private country club with dues-paying members.

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AHLA is a national trade association representing the hotel and lodging industry. Hotel PAC is a separate segregated fund established by AHLA to help elect qualified individuals who support the lodging industry. The Broadmoor has been a member of AHLA since its inception decades ago.

For over ten years, the Broadmoor hosted an annual golf tournament and fundraising event on behalf of the HotelPAC on or around the weekend before Labor Day (the "PAC event"). The PAC event was always closely planned and coordinated with AHLA and AHLA's state partner, the Colorado Hotel & Lodging Association ("CHLA"). Planning began in the spring of each year with telephone conferences about once per week. Although staffing varied somewhat from year to year, Broadmoor Human Resources Director Cindy Johnson always served as the Broadmoor's lead coordinator for the event and liaison with AHLA, and Broadmoor Purchasing Director Michael Pastor-Clark organized all the sponsors and vendors that participated. See *Declaration of Cindy Johnson*, attached as Exhibit 1; *Declaration of Michael Pastor*, attached as Exhibit 2. [redacted] was the main point of contact for AHLA, and CHLA President Christine O'Donnell represented CHLA. Toma Brashear, an Independent Hotelier and HotelPAC Auctioneer, also participated in the planning calls. Ms. Johnson, Mr. Pastor-Clark, [redacted], Ms. O'Donnell and Mr. Brashear participated in each of the weekly planning calls.

The PAC event was branded entirely by the HotelPAC; for example, people staffing the event wore HotelPAC shirts, auction bid paddles and materials donned the HotelPAC logo, and an AHLA representative typically made an informative presentation about HotelPAC. Attendees made all payments directly to HotelPAC, including admission fees and auction purchases. Exh. 1, ¶ 8. In other words, there was no mistaking that HotelPAC was the beneficiary of the event. With the exception of assisting with the registration table and setting up auction items, the Broadmoor never collected or bundled checks on behalf of HotelPAC and never received direct payment or contributions of any sort. *Id.* The Broadmoor merely provided the golf course, facilities, food and service, but AHLA otherwise ran the event. Exh. 1, ¶ 4; Exh. 2, ¶ 5.

After each PAC event, AHLA reported to the Broadmoor and CHLA the total money raised, but the Broadmoor had no role or discretion in how the funds were reported, deposited or spent. *Johnson Decl.*, ¶ 9. Neither Ms. Johnson, Mr. Pastor-Clark nor anyone else representing the Broadmoor in planning the PAC event had any experience or expertise in campaign finance regulations, and therefore they relied entirely on the instructions from AHLA and their counsel. Exh. 1, ¶ 6; Exh. 2, ¶ 11.

2010 PAC Event

As the PAC event grew in popularity, it attracted increasingly high-caliber travel packages and other unique auction items. At the same time, attendance at the event had begun to decline. *Pastor Decl.*, ¶ 6. A short time before the event, Broadmoor President and CEO Stephen Bartolin inquired with Ms. Johnson whether the Broadmoor's Golf Club members could be invited to partake in the auction and increase attendance. Exh. 1, ¶ 10, Exh. A. Ms. Johnson relayed Mr. Bartolin's idea to [redacted] at AHLA.

[redacted] told Ms. Johnson that she needed to consult with AHLA President Joe Molnerney and their legal counsel, William Farah. *Id.*

Over the next few weeks, the parties discussed on their regular planning calls how they could appropriately invite Golf Club members to the PAC event. See Exh. 1, ¶ 11; Exh. 2, ¶ 6; *Declaration of Christine O'Donnell*, ¶ 5, attached as Exhibit 3; *Declaration of Maureen Carter*, ¶ 7, attached as Exhibit 4. Ms. Johnson recalls conference calls in which AHLA's counsel, Mr. Farah, participated. Exh. 1, ¶ 11. To

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be clear, the Broadmoor suggested inviting the Golf Club members as a way to further support HotelPAC, but they had nothing to gain by their participation in the event and appropriately deferred to AHLA to determine whether it was permissible. AHLA was enthusiastic about expanding the invite list to include Golf Club members; the Broadmoor did not insist on it. Exh. 1, ¶ 12; Exh. 3, ¶ 6; Exh. 2, ¶¶ 7, 10.

Ultimately, AHLA concluded that Golf Club members could be invited, but they must complete an AHLA membership form at the event. Exh. 4, ¶ 8, Exhibit A; Exh. 1, ¶ 13; Exh. 4, ¶ 7; Exh. 2, ¶ 8. The membership application, which AHLA drafted and provided to the Broadmoor, offered Club members a complimentary 3-month membership in AHLA. Exh. 4, ¶ 8, Exh. A; Exh. 2, ¶ 8. It was Ms. O'Donnell's understanding that funds raised from auction items purchased by Club members would be allocated to AHLA's legislative account, not the HotelPAC account. Exh. 3, ¶ 7. The auction bidding forms at the event, however, clearly stated that "all funds are allocated to HotelPAC." See *Auction Bidding Form*, attached as Exhibit 5.

As it had always done in the past, AHLA drafted the necessary registration forms for the event and sent them to the Broadmoor. See *2010 Guest and Sponsor Registration Forms*, attached as Exhibit 6. Maureen Carter, who served as the Broadmoor's Manager of Employee Relations and Communications at the time and assisted with the PAC event in 2007-2010, received the forms from AHLA. *Carter Decl.*, ¶ 9. Ms. Carter had to modify the registration form for Club members because they were only invited to the dinner and auction, not the golf tournament. Accordingly, she revised AHLA's registration form only by deleting the information about the golf tournament. See *2010 Golf Club Member Registration*, attached as Exhibit 7; Exh. 4, ¶ 9. She made no changes to the language of the form or legal disclaimers. *Id.*; compare Exh. 6 to Exh. 7. As a matter of standard procedure, the Broadmoor was required to have AHLA approve all registration forms before distribution. Exh. 4, ¶ 10, Exh. B.

The final registration form for Club members requested a \$50.00 credit card payment to HotelPAC. The Broadmoor followed AHLA's instructions exactly and attached the registration form to a letter of invitation to all Golf Club members. See *August 11, 2010 Letter and Registration Form*, attached as Exhibit 8 (also attached to Complaint as Exhibit 1); see also, Exh. 1, ¶ 12, 13; Exh. 4, ¶ 10. At the event, participating Club members were required to complete the AHLA complimentary membership form. Exh. 2, ¶ 14; Exh. 4, ¶ 10.

After the event, AHLA's staff applauded its success. _____ said the idea to invite Golf Club members was "brilliant" and expected more to attend next time. See *Email from _____ dated September 2, 2010*, Exhibit 9.

2011 Event

In the spring of 2011, planning for the PAC event commenced as usual. AHLA was enthusiastic about including Golf Club members again. Exh. 1, ¶ 15. This time, AHLA President Joe McInerney came up with the idea to offer a special discounted 1-year membership to participating Golf Club members for \$25, and AHLA again drafted and provided a form for the Broadmoor to include with its invitation to Club members. *Id.*; Exh. 2, ¶ 9; Exh. 3, ¶ 8. Ms. O'Donnell recalls that AHLA offered the membership rate so that contributions from Club members could be attributed to HotelPAC rather than AHLA's legislative account. Exh. 3, ¶ 8.

According to AHLA's instructions, the Broadmoor sent a letter to Golf Club members inviting them to the PAC event and instructing them to complete the Membership Application form provided by AHLA. The letter informed Club members that the event was "complimentary" with a \$25 membership fee payable to

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AHLA. See August 3, 2011, Letter and Membership Form, attached as Exhibit 10. The event was held on August 8, 2011, and was otherwise run exactly as in 2010.

2012 Event

Event planning commenced as usual in 2012. Once AHLA learned of the complaint, however, they convened a conference call between i, AHLA's counsel Mr. Farah, and Mr. Bartolin. Mr. Bartolin relayed the conversation to Ms. Johnson, who was included in subsequent discussions regarding the FEC complaint and modifications to the 2012 PAC Event as a result. Exh. 1, ¶ 17. AHLA requested that the Broadmoor provide copies of records related to PAC Events for 2010 and 2011. In addition, AHLA instructed the Broadmoor to withdraw the invitations to the Golf Club members, which they did on August 17, 2012. See *Retraction Letter*, attached as Exhibit 11. Finally, the event was entirely re-branded as the "AHLA-Broadmoor Classic" and HotelPAC was stricken from all the materials and verbiage. Exh. 1, ¶ 18; Exh. 2, ¶ 10.

In summary, the PAC event was always run by AHLA and the Broadmoor merely served as their host. Exh. 1, ¶ 4; Exh. 2, ¶¶ 5, 10; Exh. 3, ¶ 4. The Broadmoor does not operate a political committee of its own, and its staff are not versed in the nuances of federal election law. Exh. 1, ¶ 6; Exh. 2, ¶ 12. At all times, the Broadmoor deferred entirely to AHLA in the conduct of the event, utilized materials they provided, followed their instructions completely, and reasonably relied on AHLA to comply with the law. Exh. 4, ¶ 10; Exh. 1, ¶ 4, 14, 19; Exh. 2, ¶ 5, 12.

All of the following Broadmoor staff had the same recollection of the events as described above: Jennifer Cook (Culinary), Sherry Clark (Golf Club), Cindy Johnson (Director of Human Resources), Michael Pastor-Clark (Director of Purchasing), Kate Manzaneras (Assistant Director of Human Resources), Maureen Carter (Human Resources), and Steve Bartolin (President and CEO). In addition, Christine O'Donnell (CHLA), and Independent Hotelier and HotelPAC Auctioneer Toma Brashear, can further corroborate the facts as presented. Exh. 1, ¶ 20.

AHLA Magazine

The complaint alleges that AHLA improperly solicited non-members through its magazine entitled *Lodging*. According to complainant, she received numerous "unsolicited and complimentary copies" of the magazine "during the subject years."

The Broadmoor has no knowledge of or control over the information distributed by AHLA. However, it appears that the complainant and other Club members were well on notice that they would receive information from AHLA. The membership application forms provided by AHLA and required to be filled out by Club members in order to participate in the PAC event clearly stated that "[y]our email address will help us deliver important member news and benefits..." and "[t]his complimentary 3-month membership entitles you to receive the AR&LA Newsletters, Smart Brief and other benefits." See Exh. 4, A.

The Broadmoor has no knowledge regarding what, if any, information was actually sent by AHLA and cannot be held liable for any alleged violations of law stemming therefrom.

Legal Standards

The Federal Election Campaign Act of 1971, as amended (the "Act"), prohibits a corporation from making contributions or expenditures in connection with any Federal election. 2 U.S.C. § 441b(a); 11 C.F.R. § 114.2(b). Section 441b(a) further prohibits any political committee to knowingly accept such a contribution. 11 C.F.R. § 114.2(d). The term "contribution or expenditure" shall include "any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value... to any candidate, campaign committee, or political party or organization, in connection with any" Federal election. 2 U.S.C. §§ 441b(b)(2) and 431(8)(A)(i); 11 C.F.R. §§ 114.1(a)(1) and 100.7(a)(1). The Act states, however, that the term "contribution or expenditure" does not include "the establishment, administration, and solicitation of contributions to a separate segregated fund ("SSF") to be utilized for political purposes by a corporation, labor organization, membership organization, cooperative, or corporation without capital stock." 2 U.S.C. § 441b(b)(2)(C).

A trade association is defined at 11 C.F.R. § 114.8(a) as "a membership organization of persons engaging in a similar or related line of commerce, organized to promote and improve business conditions in that line of commerce and not to engage in a regular business of a kind ordinarily carried on for profit, and no part of the net earnings of which inures to the benefit of any member." An incorporated trade association or its SSF is permitted to solicit contributions from the stockholders and executive or administrative personnel, and their families, of the association's member corporations, provided that the member corporation involved has separately and specifically approved the solicitation and has not approved a solicitation by any other trade association for the same calendar year. 2 U.S.C. 441b(b)(4)(D) and 11 C.F.R. 114.8. In addition, an incorporated trade association or its SSF may solicit its noncorporate members. 2 U.S.C. 441b(b)(4)(C) and 11 CFR 114.7. This constitutes a trade association's "restricted class."

AHLA is a trade association and membership organization under the Act, and HotelPAC is its SSF. The Broadmoor is a member of AHLA and a member of HotelPAC's restricted class. The Broadmoor, therefore, did not violate the Act or any other laws by hosting the events on behalf of the HotelPAC.

Moreover, the Broadmoor should not be held responsible for the allegedly improper solicitation of complainant and the other Golf Club members. First, all invitations to the PAC event were made on behalf of AHLA and with their approval. Any letters sent by Broadmoor staff were sent according to the precise instructions of AHLA. Second, by law the connected organization and the SSF are solely responsible for the solicitation and receipt of contributions, not their members. Regardless of whether the SSF uses its connected organization or another committee as its collecting agent, the SSF remains responsible for seeing that the agent follows the rules for soliciting and depositing contributions and forwarding records. The SSF is also responsible for reporting the contributions to the FEC. 11 C.F.R. 102.6(c)(1). The SSF is prohibited from knowingly accepting prohibited contributions and if a check appears to come from a prohibited source, the SSF must confirm its legality or return it. 11 C.F.R. 103.3(b)(1), (4) and (5).

As is explained above, under no circumstances did the Broadmoor knowingly or willfully violate the Federal Election Campaign Act ("Act"), or any other law. At no point did the Broadmoor staff misunderstand their instructions from AHLA or act overzealously or carelessly. To the contrary, the Broadmoor staff worked closely and diligently with AHLA and their counsel, and the Broadmoor reasonably relied on them to comply with federal campaign finance laws. Any inappropriate contributions that were allegedly solicited and received were the responsibility of AHLA and HotelPAC, not the Broadmoor. To the extent the Broadmoor committed any violations of law it did so unintentionally and accidentally.

Regards,

Chantell Taylor

Chantell Taylor

Attorney
chantell.taylor@hoganlovells.com
D (303) 454-2466

cc: William J. Farah
Partner
McGuireWoods LLP
2001 K Street, N.W., Suite 400
Washington, D.C. 20006

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Exhibit 5

HotelPAC BRO^ADMOOR Classic

Auction Bidding Form

September 1, 2010

Bidder Number: _____

Name: _____
Please Print

Title: _____

Company: _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

Credit Card Type: Visa MasterCard AMEX Discover

Card #: _____ Exp. Date: _____

If using AMEX please provide 4 digit CID#: _____

Signature: _____

*All bids are final and all funds are allocated to HotelPAC.
Should you decide not to bid, this form will be destroyed for your protection.*

HotelPAC is a voluntary, nonprofit, bipartisan political action committee that exists to help qualified individuals who recognize the importance of the lodging industry. Contributions to HotelPAC are voluntary and are not tax deductible as a charitable contribution for federal income tax purposes. Federal election laws allow us to accept only personal contributions.



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Exhibit 6

2010 HotelPAC BRO^ADMOOR Classic Golf Tournament

September 1, 2010

The BRO^ADMOOR • Mountain Course • Colorado Springs, Colorado

GOLF TOURNAMENT INFORMATION

9:30am – Registration | 10:00am – Box Lunches | 11:00am – Shotgun Start
Live and Silent Auctions, Awards Reception, and Dinner to Follow Golf Tournament

DINNER PACKAGE (for non-golfers)

5:30pm – Cocktails, Hors D'oeuvres, Dinner, Live and Silent Auctions at the Cheyenne Lodge

The BRO^ADMOOR is offering a \$179.00 room rate from September 1 – 2, 2010. When making a reservation please call 800-634-7711 and refer to the 2010 HotelPAC BRO^ADMOOR Classic Golf Tournament.

To participate in this year's golf tournament, please visit our secure online registration site at www.ahla.com/broadmoorclassic.

You may also fax the attached registration form to AH&LA at 202-289-3185.

If you prefer to mail in your registration form with a PERSONAL check only, please make the check payable to "HotelPAC" and send to the address below:

American Hotel & Lodging Association

Attn: Jon Simons

1201 New York Ave. NW, Ste. 600

Washington, D.C. 20005-3931

For questions, please call Jon Simons at 202-289-3125 or email him at jsimons@ahla.com.

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2010 HotelPAC BRO^ADMOOR Classic Golf Tournament

REGISTRATION FORM

GOLF TOURNAMENT PLAYER/GUEST REGISTRATION

☐ Individual Golfer & Dinner: \$250

☐ Team (Four Golfers) & Dinner: \$950

Sponsor/Cardholder: _____

Company/Title: _____

Address 1: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

Player 2 & Company: _____

Player 3 & Company: _____

Player 4 & Company: _____

DINNER AND LIVE AUCTION REGISTRATION

☐ Dinner Package: \$100 per person

Guest 1/Cardholder: _____

Company/Title: _____

Address 1: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

PAYMENT INFORMATION

Charge my card the total of \$_____. (Circle one) VISA MASTERCARD AMEX DISCOVER

Credit Card #: _____ Exp. Date: _____ AMEX CID: _____

SIGNATURE: _____ Date: _____

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2010 HotelPAC BRO^ADMOOR Classic Golf Tournament

September 1, 2010

The BRO^ADMOOR • Mountain Course • Colorado Springs, Colorado

GOLF TOURNAMENT INFORMATION

**9:30am – Registration | 10:00am – Box Lunches | 11:00am – Shotgun Start
Live and Silent Auctions, Awards Reception, and Dinner to Follow Golf Tournament**

DINNER PACKAGE (For non-golfers)

5:30pm – Cocktails, Hors D'oeuvres, Dinner, Live and Silent Auctions at the Cheyenne Lodge

The BRO^ADMOOR is offering a \$179.00 room rate from September 1– 2, 2010. When making a reservation please call 800-634-7711 and refer to the HotelPAC BRO^ADMOOR Classic Golf Tournament.

To participate in this year's golf tournament, please visit our secure online registration site at www.ahla.com/broadmoorclassic.

You may also fax the attached registration form to AH&LA at 202-289-3185.

If you prefer to mail in your registration form with a PERSONAL check, please make the check payable to "HotelPAC" and send to the address below:

**American Hotel & Lodging Association
Attn: Jon Simons
1201 New York Ave. NW, Ste. 600
Washington, D.C. 20005-3931**

For questions, please call Jon Simons at 202-289-3125 or email him at jsimons@ahla.com.

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2010 HotelPAC BRO^ADMOOR Classic Golf Tournament

SPONSORSHIP OPPORTUNITIES

Registration Desk	Signage at registration desk	\$300
Driving Range	Signage & presence on driving range	\$500
Range Putting Green	Signage on driving range putting green	\$500
Clubhouse Putting Green	Signage & presence on main putting green	\$1,000
Bronze Hole Sponsor	Signage & presence on a hole	\$1,000
Gold Hole Sponsor	Signage, presence on a hole & one foursome	\$2,000
Beverage Cart	Signage on course & beverage cart	\$1,500
Goody Bag	Signage & logo items in goody bags	\$1,500
Box Lunch	Signage & one foursome	\$3,000
Golf Cart Sponsor	High visibility signage on all tournament golf carts	\$3,000
Reception Sponsor	Signage, one foursome & address attendees at reception	\$5,000
Auction Items	Donate items (trips, gifts, etc.) for silent & live auctions	Priceless

I would like to sponsor and/or donate: _____

SPONSOR INFORMATION

Player 1/Cardholder: _____

Company/Title: _____

Address 1: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

PAYMENT INFORMATION

Charge my card the total of \$_____. (Circle one) VISA MASTERCARD AMEX DISCOVER

Credit Card #: _____ Exp. Date: _____ AMEX CID: _____

SIGNATURE: _____ Date: _____

HotelPAC is a voluntary, nonprofit, bipartisan political action committee that exists to help qualified individuals who recognize the importance of the lodging industry. Contributions to HotelPAC are voluntary and not tax deductible as charitable contributions for federal income tax purposes. Federal Election laws allow us to accept only personal contributions.



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Exhibit 7

2010 HotelPAC BROADMOOR Classic

Wednesday, September 1, 2010

5:30pm

Cheyenne Mountain Lodge

RECEPTION, DINNER, LIVE AND SILENT AUCTION REGISTRATION

o Dinner Package: \$50 per person

Guest 1/Cardholder: _____

Company/Title: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

Guest 2/Cardholder: _____

Company/Title: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

PAYMENT INFORMATION

Charge my card the total of \$ _____ (Circle one) ☐ VISA ☐ MASTERCARD ☐ AMEX ☐ DISCOVER

Credit Card #: _____ Exp. Date: _____ AMEX CID: _____

SIGNATURE: _____ Date: _____

HotelPAC is a voluntary, nonprofit, bipartisan political action committee that exists to help qualified individuals who recognize the importance of the lodging industry. Contributions to HotelPAC are voluntary and not tax deductible as charitable contributions for federal income tax purposes. Federal Election laws allow us to accept only personal contributions.



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Exhibit 8

August 11, 2010

Name

Address 1

Address 2

City, State, Zip

Dear _____,

Each year The BRO^ADMOOR hosts a fundraising event on behalf of the American Hotel & Lodging Association Political Action Committee, whereby people in our industry and suppliers get together for a golf event and a dinner at Cheyenne Lodge with the highlight being a live and silent auction with some incredible travel destination offerings going at super great values. This year we would like to do something a little different and open it up to those members who would like to attend and enjoy a nice reception and a great dinner at Cheyenne Lodge but, most of all, to have an opportunity to bid on some of these unique travel packages and enjoy some terrific deals. Here are some examples to give you some flavor:

- The Naples Beach Hotel & Golf Club
- Fairmont Southampton in Bermuda
- Hyatt Regency Lost Pines Resort and Spa in Austin, Texas
- Two nights in an ocean view suite at the spectacular new Terranea Resort in southern California
- The Westin-Kierland Resort and Spa, Arizona
- The Breakers in Palm Beach
- La Jolla Beach and Tennis Club
- The Ritz-Carlton, Naples, Florida
- Pebble Beach Resort
- The Ocean Reef Club, Key Largo
- The Ponte Verde Inn
- The Inn on Biltmore Estate
- The Montage, Laguna Beach

In all there are over 100 travel packages that will be auctioned. The date is September 1, 2010. The cost is \$50 per person, which includes the reception and dinner. Please complete the attached registration form and return to Kelly Eide in The BRO^ADMOOR Golf Club by Monday, August 30th. The charge for dinner and any auction items that you may choose to purchase can be charged to your personal major credit card.

Thank you and we hope to see you there.

Sherry L. Clark

Sherry Clark
Golf Club Manager
The BRO^ADMOOR

Stephen Bartolin, Jr.

Stephen Bartolin, Jr.
President and CEO
The BRO^ADMOOR

Enclosure

13044350104

2010 HotelPAC BROADMOOR Classic

Wednesday, September 1, 2010

5:30pm

Cheyenne Mountain Lodge

RECEPTION, DINNER, LIVE AND SILENT AUCTION REGISTRATION

o Dinner Package: \$50 per person

Guest 1/Cardholder: _____

Company/Title: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

Guest 2/Cardholder: _____

Company/Title: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Email: _____ Phone: _____

PAYMENT INFORMATION

Charge my card the total of \$_____. (Circle one) VISA MASTERCARD AMEX DISCOVER

Credit Card #: _____ Exp. Date: _____ AMEX CID: _____

SIGNATURE: _____ Date: _____

HotelPAC is a voluntary, nonprofit, bipartisan political action committee that exists to help qualified individuals who recognize the importance of the lodging industry. Contributions to HotelPAC are voluntary and not tax deductible as charitable contributions for federal income tax purposes. Federal Election laws allow us to accept only personal contributions.



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Exhibit 10

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August 3, 2011

Each year The BRO^ADMOOR hosts a fundraising event on behalf of the American Hotel & Lodging Association Political Action Committee, whereby people in our industry and suppliers get together for a golf event and a dinner at Cheyenne Lodge with the highlight being a live and silent auction with some incredible travel destination offerings going at super great values. This year again, we would like to invite you as Broadmoor Golf Club members to attend and enjoy a nice reception and a great dinner at Cheyenne Lodge (complimentary) but, most of all, to have an opportunity to bid on some of these unique travel packages and enjoy some terrific deals. This event is Monday, August 8th at 5:00 p.m. at Cheyenne Lodge. Here are some examples to give you some flavor:

- Montage Laguna Beach
- Fairmont Southampton in Bermuda
- The Hotel Hershey
- Two nights in an ocean view suite at the spectacular new Terranea Resort in southern California
- The Westin-Kierland Resort and Spa, Arizona
- The Breakers in Palm Beach
- La Jolla Beach and Tennis Club
- Ponte Vedra Inn & Club
- The Ocean Reef Club, Key Largo
- The Atlantis in the Bahamas
- Las Vegas Professional Bull Riders World Finals Package
- The Grove Park Inn

In all there are over 150 amazing travel packages that will be auctioned. The cost is complimentary, which includes the reception and dinner which starts at 5:00 p.m. at Cheyenne Lodge. Please call Shannon Cordovano at 577-5898 as soon as possible and by 12 noon on Monday, August 8th at the latest. We apologize for the short notice and hope that you can make plans to attend!! Any auction items that you may choose to purchase can be charged to your personal major credit card.

Thank you and we hope to see you there.

Sherry L. Clark
Sherry Clark
Golf Club Manager
The BRO^ADMOOR

Stephen Bartolin, Jr.
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President and CEO
The BRO^ADMOOR



HOTEL POLITICAL ACTION COMMITTEE
1201 New York Avenue, NW • #800 • Washington, DC 20005
Tel. 202-289-3128 • Fax 202-289-3185 • www.ahla.com

Dear Potential Member,

Recently, the America Hotel & Lodging Association (AH&LA) has instituted a program to offer alternate membership opportunities to friends of our industry. The AH&LA is the sole national organization in the United States, representing all sectors and stakeholders in the lodging industry.

Although this is a discounted program, you will receive the current full membership benefits and rights available to all members. It provides you with the opportunity to attend conferences and events at discounted admission prices or complementary registration at some events like the AH&LA Fall Conference in New York City which is held in conjunction with the International Hotel/Motel & Restaurant Show; attend our Legislative Action Summit, obtain discounted material from our Educational Institute, and participate in other networking events. To learn more about all our benefits, go to our website www.ahla.com.

Hopefully, you will accept this special offer and join the AH&LA. For your information, attached is a membership application. If you need any additional information, please contact Sandi Goad, director of membership at 202-289-3142 or sgoad@ahla.com. I look forward to seeing you at an AH&LA event.

Sincerely,

Joseph A. McInerney CHA



1201 New York Avenue, NW, #600 • Washington, DC 20005-3931
Tel: 202-289-3100 • Fax: 202-289-3199 • www.ahla.com

MEMBERSHIP APPLICATION

Please complete the application and return with \$25.00 for your 12-Month Membership in the American Hotel & Lodging Association. (September – August, 2012)

Contact Name and Title

Company Name

Address

City, State, Zip

Country

Telephone

Fax

Email Address *(Your email address will help us deliver important member news and benefits. AH&LA will never sell or share your email address.)*

Company Website

Please check the membership segment that best meets your description.

- | | |
|---|---|
| <input type="checkbox"/> Sole Practitioner | <input type="checkbox"/> Retired Hotelier |
| <input type="checkbox"/> Allied (Vendor/Supplier) | <input type="checkbox"/> WIL (Women in Lodging) |
| <input type="checkbox"/> University/Faculty | <input type="checkbox"/> Other |

Payment Information:

- ☐ VISA ☐ American Express ☐ MasterCard

Credit Card # _____ Expiration Date _____

Name on Card _____ Security Code _____

Signature _____ Date _____

For more information please contact Anne-Wesley Teague at AH&LA:

Telephone: (202) 289-3125

Email: awteague@ahla.com